

RHODES, HIERONYMUS, JONES, TUCKER & GABLE, P.L.L.C.
LAWYERS

ONEOK Plaza
100 West 5th Street, Suite 400
Tulsa, Oklahoma 74103-4287
Telephone (918) 582-1173
Fax (918) 592-3390
www.rhodesokla.com

Mailing Address
P.O. Box 21100
Tulsa, Oklahoma 74121-1100

Chris L. Rhodes, III
Bert M. Jones
John H. Tucker
Jo Anne Deaton
Dan S. Folluo
Ann E. Allison
Andrew D. Downing
Bradley A. Jackson
Colin H. Tucker

Kerry R. Lewis
Leslie J. Southerland
Nathan E. Clark
Theresa Noble Hill
Carlye O. Jimerson
Bradley S. Shells
Lindsey J. McDowell
Denelda L. Richardson
Maria E. Cervantes

Hal Crouch (1902-1947)
Chris L. Rhodes (1902-1966)
E. D. Hieronymus (1908-1994)
George W. Gable (1918-2000)

— Est. 1931 —
Daniel D. Draper, III
James D. Johnson
Of Counsel

Reply to: John H. Tucker
jtucker@rhodesokla.com

Rhodes Hieronymus

O K L A H O M A

March 20, 2008

VIA EMAIL ONLY

Richard T. Garren
Riggs Abney Neal Turpen
Orbison & Lewis, Inc.
502 W. 6th Street
P.O. Box 1046
Tulsa, OK 74101

Louis W. Bullock
Miller Keffer & Bullock, PC
110 W 7th Street, Suite 707
Tulsa, OK 74119-1031

Mr. David P. Page
Bell Legal Group
P.O. Box 1769
Tulsa, OK 74101

Robert A. Nance
Riggs Abney Neal Turpen
Orbison & Lewis
5801 Broadway Extension, Suite 101
Oklahoma City, OK 73118

Ms. Elizabeth Claire Xidis
Motley Rice LLC
28 Bridgeside Boulevard
Mt. Pleasant, SC 29465

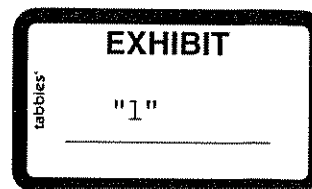
Re: State of Oklahoma v. Tyson, et al.
Our File No.: 1790-2

Dear Counsel:

This letter follows-up on the 30(b)(6) notices served by Plaintiffs on the Cargill Defendants. The Court stayed these depositions until conclusion of the hearing on Plaintiffs' motion for preliminary injunction ("PI"). While we have had no contact from Plaintiffs regarding the scheduling of these depositions, if it remains Plaintiffs' desire to pursue these depositions, please contact me at your earliest convenience regarding the two matters discussed below.

First, Plaintiffs served the Cargill Defendants with three sets of 30(b)(6) notices. These notices were served on July 13, 2007; December 21, 2007 and January 18, 2008. Although some topics were duplicated among the notices, other topics were not. Please advise us as soon as possible which set of notices and/or topics Plaintiffs wish to pursue.

Second, the Cargill Defendants have identified at least two designees who will respond to the topics noticed by Plaintiffs. The Cargill Defendants are prepared to make these designees available for deposition as follows:



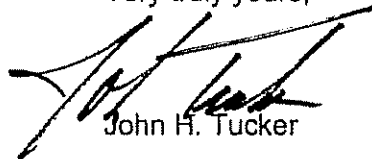
Counsel for Plaintiffs
March 20, 2008
Page 2 of 2

| | <u>Date</u> | <u>Location</u> |
|-----------------|---|-----------------|
| First Designee | Either April 3 rd or 4 th | Tulsa, OK |
| Second Designee | Either April 10 th or 11 th | Wichita, KS |

We will advise you of the specific topics to which each designee will respond after you identify the particular notices upon which you will proceed.

As these dates are fast-approaching, we ask that you respond to this letter as soon as possible. We cannot assure that our designees will be able to hold these dates open if we do not hear from you by close of business Tuesday, March 25th.

Very truly yours,



John H. Tucker

JHT:law